

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

SIMRET SEMERE TEKLE,

Plaintiff,

v.

NOUF BINT NAYEF ABDUL-AZIZ AL
SAUD, MOHAMMAD BIN ABDULLAH AL
SAUD,

Defendants.

Case No. 1:18-cv-211

**PLAINTIFF’S MEMORANDUM IN SUPPORT OF PLAINTIFFS’ MOTION TO FILE
UNDER SEAL EXHIBITS SUBJECT TO THE PROTECTIVE ORDER**

Pursuant to Local Civil Rule 5, Plaintiffs move to file under seal one exhibit containing deposition testimony. This document is an exhibit to their Memorandum in Opposition to Defendants’ Motion to Compel Plaintiff’s and Plaintiffs’ Counsel’s Testimony. Plaintiffs’ counsel conferred with Defense counsel, who do not oppose this motion to seal.

Plaintiff’s brief and four out of five exhibits are not being filed under seal. The final exhibit is a deposition transcript. The transcript was designated as “Confidential” pursuant to the Joint Stipulated Protective Order entered in this case, Dkt 74. The Joint Stipulated Protective Order requires parties seeking to file “Confidential Material” to redact the material from the filing, submit the material ex parte, or seek permission to file under seal. In order to comply with the Stipulated Protective Order, Plaintiffs therefore move to file this one exhibit under seal. Filing under seal is appropriate. The parties will have an opportunity to unseal any relevant

material before trial and Plaintiffs are willing to file a redacted transcript on the record, so the portions cited in their motion are available to the public, if the Court so orders.

Dated: May 15, 2019

Respectfully submitted,

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